

**UNITED BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Daneen Henderson : Chapter 13  
:   
: Bankruptcy No. 21-12592 amc  
Debtor. :   
:   
:

**DEBTOR'S CERTIFICATION IN OPPOSITION TO TRUSTEES MOTION TO DISMISS**

I, Daneen Henderson, do hereby depose and state:

1. I am the debtor in this matter. I am fully familiar with the facts herein.
2. I filed this bankruptcy on September 8, 2021.
3. The original chapter 13 plan was denied. An amended plan is to be filed..
4. I have been making my regular trustee and mortgage payments since the inception of this matter. I am now paying \$327.99 to the trustee every month.
5. An amended plan is needed in order to correct any deficiency in the base amount of the plan payments.
6. My attorney informed me that there are/were claims by creditors that were higher than I originally thought they were. Thus, our plan had to be adjusted earlier. Due to these adjustments, the plan presumably need additional adjustments of which my attorney is prepared to do. She has reached out to Ms. Vicki Wilson and possibly Jack Miller. Staff attorney, in order to address any current concerns so that the case may move forward.
7. Accordingly, I am asking that my bankruptcy does not get dismissed at this time and that ann amended plan will be filed to cure any deficiency.

I do hereby certify that the foregoing statements are true and correct. I understand that if any of the foregoing statements are willfully false, then I am subject to punishment.

Date: 3-21-2023

By: /s/ Daneen Henderson

Daneen Henderson  
Debtor herein.